

Objection Deadline: January 13, 2010 at 4:00 p.m. (Prevailing Eastern Time)  
Presentment Date and Time: January 20, 2010 at 10:00 a.m. (Prevailing Eastern Time)  
Hearing Date and Time (if an Objection is Filed): TBD

GODFREY & KAHN, S.C.  
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Timothy F. Nixon (TN 2644)

*Proposed Attorneys for Fee Examiner*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re :  
: Chapter 11  
: Case No.09-50026 (REG)  
MOTORS LIQUIDATION COMPANY, et al. :  
: (Jointly Administered)  
Debtors. :  
:  
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**NOTICE OF PRESENTMENT OF APPLICATION OF THE FEE EXAMINER FOR  
AUTHORIZATION TO EMPLOY AND RETAIN GODFREY & KAHN, S.C. AS FEE  
AND EXPENSE ANALYST, NUNC PRO TUNC TO DECEMBER 28, 2009**

**PLEASE TAKE NOTICE THAT THE UNDERSIGNED WILL PRESENT THE**  
ANNEXED Application (the “Application”) of the Fee Examiner of Motors Liquidation  
Company and its affiliated debtors in the above-referenced chapter 11 cases, pursuant to the  
Stipulation and Order With Respect to Appointment of a Fee Examiner [Docket No. 4708] for  
authorization to employ Godfrey & Kahn, S.C. (“G&K”) as fee and expense analyst, *nunc pro*  
*tunc* to December 28, 2009, all as more fully described in the accompanying Application to the  
Honorable Robert E. Gerber, United States Bankruptcy Judge, for approval and signature on  
**January 20, 2010 at 10:00 a.m. (Prevailing Eastern Time).**

**PLEASE TAKE FURTHER NOTICE** that objections to the Application, if any, shall  
be in writing, shall conform to the Bankruptcy Rules and the Local Rules of the Bankruptcy

Court for the Southern District of New York, shall set forth the name of the objecting party, the basis for the objection and the specific grounds, shall be filed with the Bankruptcy Court electronically in accordance with General Order M-242 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)) by registered users of the Bankruptcy Court's case filing system and by all other parties in interest, on 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with two hard copies delivered directly to Chambers) and shall be served upon: (i) the chambers of the Honorable Robert E. Gerber, One Bowling Green, New York, New York 10004, Courtroom 601; (ii) Weil, Gotshal & Manges, LLP, attorneys for the Debtors, 767 Fifth Avenue, New York, New York 10153 (Attn: Harvey R. Miller, Esq., Stephen Karotkin, Esq., and Joseph H. Smolinsky, Esq.); (iii) the Debtors, c/o Motors Liquidation Company, 300 Renaissance Center, Detroit, Michigan 48265 (Attn: Ted Stenger); (iv) General Motors Company, 300 Renaissance Center, Detroit, Michigan 48265 (Attn: Lawrence S. Buonomo, Esq.); (v) Cadwalader, Wickersham & Taft LLP, attorneys for the United States Department of the Treasury, One World Financial Center, New York, New York 10281 (Attn: John J. Rapisardi, Esq.); (vi) the United States Department of the Treasury, 1500 Pennsylvania Avenue NW, Room 2312, Washington, D.C. 20220 (Attn: Joseph Samarias, Esq.); (vii) Vedder Price, P.C., attorneys for Export Development Canada, 1633 Broadway, 47th Floor, New York, New York, 10019 (Attn: Michael J. Edelman, Esq. and Michael L. Schein, Esq.); (viii) Kramer Levin Naftalis & Frankel LLP, attorneys for the statutory committee of unsecured creditors, 1177 Avenue of the Americas, New York, New York 10036 (Attn: Thomas Moers Mayer, Esq., Amy Caton, Esq., Adam C. Rogoff, Esq., and Gregory G. Plotko, Esq.); (ix) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, New York, 10004 (Attn: Diana G. Adams, Esq.); (x)

the U.S. Attorney's Office, S.D.N.Y., 86 Chambers Street, Third Floor, New York, New York, 10007 (Attn: David S. Jones, Esq. and Matthew L. Schwartz, Esq.) and (xi) Godfrey & Kahn, S.C., 780 North Water Street, Milwaukee, Wisconsin 53202 (Attn: Timothy F. Nixon, Esq.), **so as to be so filed and received by no later than January 13, 2010, at 4:00 p.m. (Prevailing Eastern Time)** (the "Objection Deadline").

**PLEASE TAKE FURTHER NOTICE** that the relief requested may be granted without a hearing if no objection is timely filed and served in accordance with the procedures outlined above. If a written objection is timely filed and served, a hearing will be scheduled by the Court to be held at the United States Bankruptcy Court for the Southern District of New York, Judge Robert E. Gerber, presiding, One Bowling Green, New York, New York 10004-1408. If an objection is filed, the moving and objecting parties are required to attend the hearing, and failure to appear may result in relief being granted or denied upon default.

Dated: January 5, 2010.

GODFREY & KAHN, S.C.

By: /s/ Timothy F. Nixon  
Timothy F. Nixon (TN 2644)

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